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**ATTORNEYS FOR PLAINTIFF**

**K.D., A MINOR, BY AND THROUGH  
HIS GUARDIAN AD LITEM,  
LAQUANTAE DAVIS**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

K.D., a minor, by and through his  
Guardian ad Litem, LAQUANTAE  
DAVIS,

Plaintiff,

v.

CALIBER CHANGEMAKERS  
ACADEMY, VALLEJO CITY UNIFIED  
SCHOOL DISTRICT, RACHAEL  
WEINGARTEN, AISHA FORD and  
DOES 1-50 inclusive,

Defendants.

Case No. 2:23-cv-00083-DJC-JDP

**JOINT STIPULATION AND ORDER  
TO MODIFY SCHEDULING ORDER  
(Dkt. 72)**

Honorable Daniel J. Calabretta  
Magistrate Jeremy D. Peterson

Filed: January 13, 2023  
Trial May 11, 2026

The Parties, through their undersigned counsel, hereby jointly stipulate and  
request the Court enter an order as follows:

**WHEREAS:**

1. Defendant Caliber Changemaker Academy (CCA) completed its document  
production in the Fall of 2024;
2. Since January 2025, Plaintiff has been diligently attempting to schedule

1 the depositions of Defendant Aisha Ford, multiple current and former CCA  
2 employees and CCA's 30(b)(6) witness; Defendant took the first session of  
3 the deposition of Guardian Ad Litem LAQUANTAE DAVIS on October 24,  
4 2024. Plaintiff took the deposition of defendant RACHAEL WEINGARTEN  
5 on March 3, 2025.

- 6 3. Since the Spring of 2024, Defendant has been diligently attempting to  
7 reach agreement with Plaintiff about the terms of a mental health  
8 Independent Medical Examination and the procedures for deposition of the  
9 minor Plaintiff KD, but to date no such agreement has been secured;
- 10 4. On April 2, 2025, the Parties participated in a settlement conference before  
11 Magistrate Judge Peterson and the case did not resolve;
- 12 5. The Court set a Further Settlement Conference for June 20, 2025 (Dkt. 86);
- 13 6. The deposition of Defendant Aisha Ford, as well as multiple current and  
14 former CCA employees and 30(b)(6) witness, were noticed for late May  
15 and June 2025, but cannot proceed due to the following ongoing issues:
  - 16 a. Defendant AISHA FORD has her own personal attorney who is advising  
17 her on issues regarding her defense, representation and deposition, and  
18 that attorney has been in discussions with defendants' counsel.
  - 19 b. The CCA employees who are licensed clinicians or certified education  
20 professionals have taken the position that they will not testify without  
21 Plaintiff first obtaining advance written "authorization" from the legal  
22 guardians of KD and K.J.W.; at least one of these clinicians has her own  
23 personal attorney advising her on licensing matters. Plaintiff's position  
24 is that such authorizations are not appropriate;
- 25 7. The parties have been meeting and conferring by email, are in process of  
26 scheduling an in-person meet and confer on this issue, and anticipate  
27 that court intervention will be necessary;
- 28 8. Under the current deadlines, lay discovery will close before Plaintiff can

complete the depositions of Defendant CCA employees;

9. Defendant CCA intends to conduct a Rule 35 Examination and deposition of the minor Plaintiff and the Parties are presently meeting and conferring regarding the dates and scope; Defendant also intends to complete the deposition of Guardian Ad Litem Laquantae Davis;

10. The parties jointly stipulate and request that the deadlines as set forth in the Scheduling Order (Dkt. 72) shall be extended as follows:

Deadline	Current	Proposed
Fact Discovery	06/06/25	<b>08/08/2025</b>
Expert Disclosure	07/04/2025	<b>09/05/2025</b>
Rebuttal Expert Disclosure	08/01/2025	<b>11/03/2025</b>
Expert Discovery	08/29/2025	<b>10/30/2025</b>
Dispositive Filings	11/07/2025	--
Dispositive Hearing	12/18/2025	--
Pretrial Conference	03/12/2026	--
Jury Trial	05/11/2026	--

11. As shown above, the current dates and deadlines the Parties propose for dispositive motion filing, dispositive motion hearing date, pretrial conference, and jury trial ***would remain unchanged.***

12. Good cause supports this joint request, as the pre-trial modifications would allow the parties to complete fact discovery needed for trial or pre-trial resolution. The parties cannot adequately prepare the case for trial without additional time to complete discovery.

13. The Parties respectfully submit that this modification will better allow them to resolve outstanding issues, complete discovery and prepare the case for trial.

IT IS SO STIPULATED.

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1 Dated: May 22, 2025

WALKUP, MELODIA, KELLY & SCHOENBERGER

2  
3 By: /s/ Valerie N. Rose

4 KHALDOUN A. BAGHDADI

5 VALERIE N. ROSE

6 KELLY L. GANCI

7 Attorneys for PLAINTIFF

8 K.D., A MINOR, BY AND THROUGH HIS  
9 GUARDIAN AD LITEM, LAQUANTAE  
10 DAVIS

11 Dated: May 22, 2025

YOUNG MINNEY CORR LLP

12 By: /s/ Mark Julius

13 MARK JULIUS

14 Attorney for Defendants

15 CALIBER CHANGEMAKERS ACADEMY,  
16 RACHAEL WEINGARTEN, AISHA FORD

17 **ORDER**

18 Having considered the stipulated request of the parties, and with good cause  
19 appearing, the Court orders as follows:

20 1. Final Pretrial Conference Hearing: The deadline for the Final Pre-Trial  
21 Conference will remain unchanged, March 12, 2026 at 1:30 PM

22 2. Jury Trial: The Trial date will remain unchanged, May 11, 2026 at 8:30  
23 AM

24 3. Dispositive Motion Hearing Deadline: The deadline for hearing  
25 dispositive motions will remain unchanged, December 18, 2025

26 4. Dispositive Motion Filing Deadline: The deadline to file motions,  
27 including dispositive motions, will remain unchanged, November 07, 2025.

28 5. Lay Discovery Period: The deadline to complete lay discovery *shall be*  
*extended* from June 6, 2025 to **August 8, 2025.**

1           6.     Initial Expert Disclosure: The deadline to exchange initial expert  
2 disclosure and reports *shall be extended* from July 04, 2025 to **September 05, 2025**.

3           7.     Rebuttal Expert Disclosure: The deadline to exchange rebuttal expert  
4 reports *shall be extended* from August 01, 2025 to **November 03, 2025**.

5           8.     Expert Discovery Period: The deadline to complete expert discovery  
6 *shall be extended* from August 29, 2025 to **October 30, 2025**.

7  
8 IT IS SO ORDERED.

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10  
11 Dated: May 23, 2025

/s/ Daniel J. Calabretta

12 THE HONORABLE DANIEL J. CALABRETTA  
13 UNITED STATES DISTRICT JUDGE  
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